

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO,
et al.,

Plaintiffs,

v.

GREGORY W. ABBOTT, *et al.*,

Defendants.

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Civil Action No. SA-21-CV-00844-XR

STIPULATED EXTENSION OF EXPERT DISCOVERY DEADLINE

Pursuant to this Court's standing instruction, see Fact Sheet for Judge Xavier Rodriguez ¶ 34, Plaintiffs La Union del Pueblo Entero, *et al.*¹ (Private Plaintiffs), Defendants the State of Texas and Secretary of State John Scott (State Defendants) and Defendants Travis County, Harris County, Bexar County, El Paso County, Dallas County, and Hidalgo County (County Defendants) hereby stipulate that:

1. On December 22, 2022, the United States and State Defendants filed a stipulation for purposes of amending the designation date for testifying experts. *See* Dkt. 161 (Stipulated Extension of Expert Discovery Deadline). Pursuant to that Stipulation, the United States shall file its designation of any testifying expert who relies on database extracts produced by Defendants and shall serve, but not file, the materials required by Fed. R. Civ. P.

¹ Plaintiffs, with the exception of the United States, are as follows: La Unión del Pueblo Entero, Friendship-West Baptist Church, the Anti-Defamation League Austin, Southwest, and Texoma Regions, Southwest Voter Registration Education Project, Texas Impact, Mexican American Bar Association of Texas, Texas Hispanics Organized for Political Education, Jolt Action, William C. Velasquez Institute, FIEL Houston Inc., and James Lewin, Houston Justice, Houston Area Urban League, Delta Sigma Theta Sorority, Inc., The Arc of Texas, and Jeffrey Lamar Clemmons, LULAC Texas, Voto Latino, Texas Alliance for Retired Americans, Texas AFT, Mi Familia Vota, Marla Lopez, Marlon Lopez, Paul Rutledge, OCA-Greater Houston, League of Women Voters of Texas, REVUP-Texas, Texas Organizing Project and Workers Defense Action Fund.

26(a)(2)(B) on or before February 28, 2022. The State of Texas and Secretary of State John Scott shall file their designation of any testifying expert responding solely to the United States' expert or experts who rely on database extracts produced by Defendants and shall serve, but not file, the materials required by Fed. R. Civ. P. 26(a)(2)(B) on or before March 23, 2022. The State of Texas and Secretary of State John Scott shall serve, but not file, supplemental reports authored by previously disclosed experts that respond solely to the United States' expert or experts who rely on database extracts produced by Defendants, and other materials required by Fed. R. Civ. P. 26(a)(2)(B), on or before March 23, 2022.

2. Private Plaintiffs, State Defendants and County Defendants now enter into this stipulation for purposes of amending the designation date for testifying experts as outlined below:
3. Private Plaintiffs shall file their designations of testifying experts and shall serve, but not file, the materials required by Fed. R. Civ. P. 26(a)(2)(B) on or before February 28, 2022.
4. State Defendants and County Defendants shall file their designation of testifying experts and serve on all parties, but not file, the materials required by FED.R.CIV. P. 26(a)(2)(B) on or before March 23.
5. Private Plaintiffs, State Defendants and County Defendants shall file all designations of rebuttal experts and serve on all parties the material required by FED. R. OF CIV. P. 26(a)(2)(B) for such rebuttal experts, to the extent not already served, within fifteen (15) days of receipt of the report of the opposing expert (April 7).
6. The deadline for filing supplemental reports required under FED. R. CIV. P. 26(e) remains April 29, 2022, as set out in the Court's scheduling order (Dkt. 125).
7. Nothing in this stipulation shall waive any party's rights, defenses, or objections except

as specifically described, and nothing in this stipulation shall affect the May 13, 2022

deadline for completion of discovery in the Court's Scheduling Order (Dkt. 125).

Date: January 25, 2022

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